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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEJANDRO CAMPOS-ORNELAS

Defendant.

No. SA CR 25- 00091-JDE

PLEA AGREEMENT FOR DEFENDANT
ALEJANDRO CAMPOS-ORNELAS

1. This constitutes the plea agreement between ALEJANDRO CAMPOS-ORNELAS ("defendant") and the United States Attorney's Office for the Central District of California (the "USAO") in the above-captioned case. This agreement is limited to the USAO and cannot bind any other federal, state, local, or foreign prosecuting, enforcement, administrative, or regulatory authorities.

DEFENDANT'S OBLIGATIONS

2. Defendant agrees to:

a) Plead guilty to the information in the above-captioned case at the earliest opportunity requested by the USAO and provided by the Court, in the form attached to this agreement as

1 Exhibit A or a substantially similar form, that charges defendant
2 with improper entry by alien, a violation of 8 U.S.C. § 1325(a)(1),
3 a class B misdemeanor.

4 b) Waive the right to prosecution in the district where
5 the offense alleged in the information was committed, under Fed. R.
6 Crim. P. 18, should defendant's offense have been committed outside
7 the Central District of California.

8 c) Waive the statute of limitations, under 18 U.S.C. §
9 3282, should defendant's offense have been committed more than five
10 years before the date that the information is filed.

11 d) Not contest facts agreed to in this agreement.

12 e) Abide by all agreements regarding sentencing
13 contained in this agreement.

14 f) Appear for all court appearances, surrender as
15 ordered for service of sentence, obey all conditions of any bond,
16 and obey any other ongoing court order in this matter.

17 g) Not commit any crime; however, offenses that would be
18 excluded for sentencing purposes under United States Sentencing
19 Guidelines ("USSG" or "Sentencing Guidelines") § 4A1.2(c) are not
20 within the scope of this agreement.

21 h) Be truthful at all times with the United States
22 Probation and Pretrial Services Office and the Court.

23 i) Pay the applicable special assessment at or before
24 the time of sentencing unless defendant has demonstrated a lack of
25 ability to pay such assessment.

26 j) Not file or argue any substantive motions, including
27 those described in Fed. R. Crim. P. 12.

THE USAO'S OBLIGATIONS

3. The USAO agrees to:

a) Not contest facts agreed to in this agreement.

b) Abide by all agreements regarding sentencing contained in this agreement.

c) Not to prosecute defendant for a violation of 8 U.S.C. § 1326 based on defendant's being found in the United States on or about May 5, 2025. Defendant understands, however, that the USAO may prosecute defendant for such a violation if defendant is found in the United States again.

NATURE OF THE OFFENSE

4. Defendant understands that for defendant to be guilty of the crime charged in the one-count information, a violation of 8 U.S.C. § 1325(a)(1), the following must be true: (1) defendant was, at the time of the offense, an alien, that is, a person who is not a natural-born or naturalized citizen, or national, of the United States; and (2) defendant knowingly and voluntarily entered the United States at a time and place other than as designated by immigration officers of the United States.

PENALTIES

5. The statutory maximum sentence that the Court can impose for a violation of 8 U.S.C. § 1325(a)(1) is: 6 months imprisonment; a fine of \$5,000; and a mandatory special assessment of \$10.

FACTUAL BASIS

6. Defendant admits that defendant is, in fact, guilty of violating 8 U.S.C § 1325(a)(1) as described in the information. Defendant admits to the facts provided below and agrees that this

1 statement of facts is sufficient to support a plea of guilty to the
2 charge described in this agreement.

3 7. At the time of the offense, defendant was not a citizen or
4 national of the United States. Defendant is a citizen of Mexico.
5 In or around 2015, defendant, an alien, knowingly and voluntarily
6 entered the United States from Mexico at a place other than a
7 designated port of entry; that is, defendant entered the United
8 States at the border of Mexico and Calexico, California. On or
9 about May 5, 2025, defendant was apprehended in the Central District
10 of California.

11 SENTENCING FACTORS AND RECOMMENDATIONS

12 8. Defendant understands that the sentence imposed will be
13 based on the factors set forth in 18 U.S.C. § 3553(a).
14 Additionally, the parties agree that, because the offense to which
15 defendant is pleading guilty is a Class B misdemeanor, the United
16 States Sentencing Guidelines do not apply.

17 9. The USAO agrees to recommend a sentence of three months'
18 imprisonment.

19 10. Defendant may request any term of imprisonment.

20 11. The parties stipulate and agree that there is sufficient
21 information in the record to enable the Court to exercise its
22 sentencing authority meaningfully without a presentence
23 investigation or report. The parties agree to recommend immediate
24 sentencing, with defendant's criminal history calculated pursuant to
25 a government prepared rap sheet provided that the court makes a
26 specific finding pursuant to Fed. R. Crim. P. 32(c)(1) that the
27 information in the record is sufficient to enable the court to
28 meaningfully exercise its sentencing authority pursuant to 18 U.S.C.

1 § 3553 without a pre-sentence investigation report. The Court's
2 failure to follow this recommendation does not constitute a basis to
3 withdraw the guilty plea.

4 12. The parties agree that defendant shall pay a special
5 assessment in the amount of \$10.00 to be paid forthwith at time of
6 sentencing and that all fines should be waived as defendant does not
7 have the ability to pay a fine.

8 13. The parties agree that no prior imprisonment (other than
9 credits that the Bureau of Prisons may allow under 18 U.S.C. §
10 3585(b)) may be credited against defendant's sentence, including
11 credit under Sentencing Guideline § 5G1.3.

12 WAIVER OF CONSTITUTIONAL RIGHTS

13 14. Defendant understands that by pleading guilty, defendant
14 gives up the following rights:

15 a) The right to persist in a plea of not guilty.

16 b) The right to a speedy and public trial.

17 c) The right to be represented by counsel - and if
18 necessary have the Court appoint counsel - at trial. Defendant
19 understands, however, that, defendant retains the right to be
20 represented by counsel - and if necessary have the Court appoint
21 counsel - at every other stage of the proceeding.

22 d) The right to be presumed innocent and to have the
23 burden of proof placed on the government to prove defendant guilty
24 beyond a reasonable doubt.

25 e) The right to confront and cross-examine witnesses
26 against defendant.

1 f) The right to testify and to present evidence in
2 opposition to the charges, including the right to compel the
3 attendance of witnesses to testify.

4 g) The right not to be compelled to testify, and, if
5 defendant chose not to testify or present evidence, to have that
6 choice not be used against defendant.

7 h) Any and all rights to pursue any affirmative
8 defenses, Fourth Amendment or Fifth Amendment claims, and other
9 pretrial motions that have been filed or could be filed.

10 15. Defendant has been advised by counsel and understands
11 that, because defendant is not a citizen of the United States,
12 defendant's conviction in this case may have adverse immigration
13 consequences, including defendant's removal or deportation from the
14 United States. Defendant also may be denied United States
15 citizenship and admission to the United States in the future. No
16 collateral consequences resulting from this guilty plea will serve
17 as grounds to withdraw defendant's guilty plea.

18 WAIVER OF APPEAL OF CONVICTION

19 16. Defendant understands that, with the exception of an
20 appeal based on a claim that defendant's guilty plea was
21 involuntary, by pleading guilty defendant is waiving and giving up
22 any right to appeal defendant's conviction on the offense to which
23 defendant is pleading guilty. Defendant understands that this
24 waiver includes, but is not limited to, arguments that the statute
25 to which defendant is pleading guilty is unconstitutional, and any
26 and all claims that the statement of facts provided herein is
27 insufficient to support defendant's plea of guilty.

LIMITED WAIVER OF APPEAL OF SENTENCE

17. Defendant gives up the right to appeal all of the following: (a) the term of imprisonment imposed by the Court, provided it is within the statutory maximum; and (b) any fine imposed by the Court, provided it is within the statutory maximum.

18. Defendant also gives up any right to bring a post-conviction collateral attack on the conviction or sentence, except a post-conviction collateral attack based on a claim of ineffective assistance of counsel.

RESULT OF WITHDRAWAL OF GUILTY PLEA

19. Defendant agrees that if, after entering a guilty plea pursuant to this agreement, defendant seeks to withdraw and succeeds in withdrawing defendant's guilty plea on any basis other than a claim and finding that entry into this plea agreement was involuntary, then the USAO will be relieved of all of its obligations under this agreement.

BREACH OF AGREEMENT

20. Defendant agrees that if defendant, at any time after the signature of this agreement and execution of all required certifications by defendant, defendant's counsel, and an Assistant United States Attorney, knowingly violates or fails to perform any of defendant's obligations under this agreement ("a breach"), the USAO may declare this agreement breached. All of defendant's obligations are material, a single breach of this agreement is sufficient for the USAO to declare a breach, and defendant shall not be deemed to have cured a breach without the express agreement of the USAO in writing. If the USAO declares this agreement breached, and the Court finds such a breach to have occurred, then: (a) if

1 defendant has previously entered a guilty plea pursuant to this
2 agreement, defendant will not be able to withdraw the guilty plea,
3 (b) the USAO will be relieved of all its obligations under this
4 agreement, and (c) the Court's failure to follow any recommendation
5 or request regarding sentence set forth in this agreement will not
6 provide a basis for defendant to withdraw defendant's guilty plea.

7 21. Following the Court's finding of a knowing breach of this
8 agreement by defendant, should the USAO choose to pursue any charge
9 that was either dismissed or not filed as a result of this
10 agreement, then:

11 a) Defendant agrees that any applicable statute of
12 limitations is tolled between the date of defendant's signing of
13 this agreement and the filing commencing any such action.

14 b) Defendant waives and gives up all defenses based on
15 the statute of limitations, any claim of pre-indictment delay, or
16 any speedy trial claim with respect to any such action, except to
17 the extent that such defenses existed as of the date of defendant's
18 signing this agreement.

19 c) Defendant agrees that: (i) any statements made by
20 defendant, under oath, at the guilty plea hearing (if such a hearing
21 occurred prior to the breach); (ii) the agreed to factual basis
22 statement in this agreement; and (iii) any evidence derived from
23 such statements, shall be admissible against defendant in any such
24 action against defendant, and defendant waives and gives up any
25 claim under the United States Constitution, any statute, Rule 410 of
26 the Federal Rules of Evidence, Rule 11(f) of the Federal Rules of
27 Criminal Procedure, or any other federal rule, that the statements
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1 or any evidence derived from the statements should be suppressed or
2 are inadmissible.

3 COURT AND UNITED STATES PROBATION AND PRETRIAL SERVICES

4 OFFICE NOT PARTIES

5 22. Defendant understands that the Court and the United States
6 Probation and Pretrial Services Office are not parties to this
7 agreement and need not accept any of the USAO's sentencing
8 recommendations or the parties' agreements to facts, sentencing
9 factors, or sentencing. Defendant understands that the Court will
10 determine the facts, sentencing factors, and other considerations
11 relevant to sentencing and will decide for itself whether to accept
12 and agree to be bound by this agreement.

13 23. Defendant understands that both defendant and the USAO are
14 free to: (a) supplement the facts by supplying relevant information
15 to the United States Probation and Pretrial Services Office and the
16 Court, and (b) correct any and all factual misstatements relating to
17 the Court's Sentencing Guidelines calculations and determination of
18 sentence.

19 NO ADDITIONAL AGREEMENTS

20 24. Defendant understands that, except as set forth herein,
21 there are no promises, understandings, or agreements between the
22 USAO and defendant or defendant's attorney, and that no additional
23 promise, understanding, or agreement may be entered into unless in a
24 writing signed by all parties or on the record in court.

25 PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

26 25. The parties agree that this agreement will be considered
27 part of the record of defendant's guilty plea hearing as if the
28 entire agreement had been read into the record of the proceeding.

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3 AGREED AND ACCEPTED

4 UNITED STATES ATTORNEY'S OFFICE
5 FOR THE CENTRAL DISTRICT OF CALIFORNIA

6 BILAL A. ESSAYLI
7 United States Attorney

8 *Anne C. Gannon*

May 23, 2025

9 ANNE C. GANNON
10 Assistant United States Attorney

Date

11 *Alejandro Campos Ornelas*

5-21-25

12 ALEJANDRO CAMPOS-ORNELAS
13 Defendant

Date

14 *M. Bo Griffith*
15 M. BO GRIFFITH
16 DEPUTY FEDERAL PUBLIC DEFENDER
17 Attorney for Defendant
18 ALEJANDRO CAMPOS-ORNELAS

5/21/25

Date

19 CERTIFICATION OF DEFENDANT

20 TO DEFENDANT AND COUNSEL: INITIAL THE TRUE STATEMENT AND CROSS
21 OUT THE OTHER:

22 1. This agreement has been read to me in Spanish, the
23 language I understand best. Defendant's initials: ACQ Counsel's
24 initials: ~~ACQ~~ OR:

25 2. I am fluent in English and have carefully read this
26 agreement. Defendant's initials: ____/ Counsel's initials: ____

27 I have had enough time to review and consider this agreement,
28 and I have carefully and thoroughly discussed every part of it with
my attorney. I understand the terms of this agreement, and I
voluntarily agree to those terms. I have discussed the evidence
with my attorney, and my attorney has advised me of my rights, of

possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. No promises, inducements, or representations of any kind have been made to me other than those contained in this agreement. No one has threatened or forced me in any way to enter into this agreement. I am satisfied with the representation of my attorney in this matter, and I am pleading guilty because I am guilty of the charges and wish to take advantage of the promises set forth in this agreement, and not for any other reason.

Alejandro Campos Ornelas
ALEJANDRO CAMPOS-ORNELAS
Defendant

5-21-25
Date

CERTIFICATION OF INTERPRETER [IF APPLICABLE]

I, Carina Arriola, am fluent in the written and spoken English and Spanish languages. I accurately translated this entire agreement from English into Spanish to defendant ALEJANDRO CAMPOS ORNELAS on this date.


Carina Arriola
INTERPRETER

5/21/25
Date

CERTIFICATION OF DEFENDANT'S ATTORNEY

I am ALEJANDRO CAMPOS-ORNELAS's attorney. I have carefully and thoroughly discussed every part of this agreement with my client. Further, I have fully advised my client of his rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing

1 factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing
2 Guidelines provisions, and of the consequences of entering into this
3 agreement. To my knowledge: no promises, inducements, or
4 representations of any kind have been made to my client other than
5 those contained in this agreement; no one has threatened or forced
6 my client in any way to enter into this agreement; my client's
7 decision to enter into this agreement is an informed and voluntary
8 one; and the factual basis set forth in this agreement is sufficient
9 to support my client's entry of a guilty plea pursuant to this
10 agreement.

11 
12 M. BO GRIFFITH
13 DEPUTY FEDERAL PUBLIC DEFENDER
14 Attorney for Defendant
15 ALEJANDRO CAMPOS-ORNELAS
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Date 5/21/25

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEJANDRO CAMPOS-ORNELAS,

Defendant.

SA CR No. 25-

I N F O R M A T I O N

[8 U.S.C. § 1325(a): Improper
Entry by Alien]

[CLASS B MISDEMEANOR]

The United States Attorney charges:

[8 U.S.C. § 1325(a)]

On or about _____, defendant ALEJANDRO
CAMPOS-ORNELAS, an alien, knowingly and intentionally entered
the United States of America at a time and place other than as

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1 designated by immigration officers, in violation of Title 8,
2 United States Code, Section 1325(a)(1), a misdemeanor.

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4 BILAL A. ESSAYLI
United States Attorney

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7
8 LAWRENCE E. KOLE
Assistant United States Attorney
Domestic Security and Immigration
9 Crimes Section

10 ANNE C. GANNON
Assistant United States Attorney
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